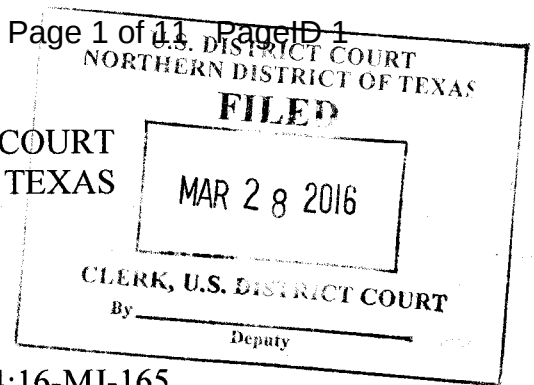


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

No. 4:16-MJ-165

ALBERT CENICEROS	(01)
CHAD EVERETT CLIFTON	
a/k/a "Big Wood"	(02)
SILTON RUSSELL GOUTREAU	
a/k/a "Pretty Boy"	(03)
BRIAN THOMAS GIBBONS	
a/k/a "Meathead"	(04)
JACK GOSSETT	(05)
TERRI FAULKNER	
a/k/a "Shae Loveless"	(06)
JENNIFER MARIE MORRISON	(07)
CHRIS SPHABMISAI	
a/k/a "Chino"	(08)
CANDACE WHITTEN	(09)

SEAL
UNTIL WARRANT EXECUTED

CRIMINAL COMPLAINT

Conspiracy to Possess with Intent to Distribute a Controlled Substance
(Violation of 21 U.S.C. § 846)

Beginning in or before July 2011, and continuing until on or about January 11, 2016, in the Fort Worth Division of the Northern District of Texas, and elsewhere, defendants **Albert CENICEROS**, **Chad Everett CLIFTON**, also known as Big Wood, **Silton Russell GOUTREAU**, also known as Pretty Boy, **Brian Thomas GIBBONS**, also known as Meathead, **Jack GOSSETT**, **Terri FAULKNER**, also known as Shae Loveless, **Jennifer Marie MORRISON**, **Chris SPHABMISAI**, also known as Chino, and **Candace WHITTEN**, along with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), namely to possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of Methamphetamine, a Schedule II controlled substance.

In violation of 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(B)).

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

I. INTRODUCTION

1. I have been a Special Agent of the DEA for approximately 16½ years. I received basic investigative instruction at the DEA Academy located in Quantico, Virginia, and additional continuing instruction regarding investigative techniques. I am currently assigned to the Fort Worth Resident Office (FWRO) of the DEA, Dallas Field Division, working with Investigators and Officers from the Fort Worth Police Department.

2. I have participated as a law enforcement officer in several investigations of unlawful narcotics distribution and have conducted wiretap investigations, physical and electronic surveillances, undercover transactions, the execution of search and arrest warrants, debriefings of informants, and review of taped conversations and drug records. Through my training, education and experience, I have become familiar with the manner in which illegal drugs are transported, stored and distributed, and the methods of payments for such drugs. I am also familiar with some of the methods by which narcotics traffickers communicate and code words commonly used by narcotics traffickers.

II. SUMMARY OF PROBABLE CAUSE THAT A VIOLATION OF 21 U.S.C. § 846 HAS OCCURRED

3. As part of the conspiracy, not every person named or identified in the conspiracy knew every other person identified as being in the conspiracy.

It was their joining together for the common purpose of possessing and distributing methamphetamine, the nature of the scheme to possess and distribute methamphetamine, and the overlapping among its members in possessing and distributing methamphetamine that established their membership in this particular conspiracy. And not every member of the conspiracy knew the details of each aspect of the conspiracy. Nevertheless, each member of the conspiracy knew or was aware of the conspiracy's general purpose and scope, which was to possess and distribute methamphetamine in the Northern District of Texas and elsewhere, between and among the named conspirators and others not named.

4. As part of the conspiracy, its members had a fluid hierarchy that evolved over time. For example, as some members were arrested or otherwise temporarily unavailable, other members took over the receipt and delivery of methamphetamine.

5. Since approximately 2014, the government has been investigating allegations that **Albert CENICEROS**, **Chad Everett CLIFTON**, also known as Big Wood, **Silton Russell GOUTREAUX**, also known as Pretty Boy, **Brian Thomas GIBBONS**, also known as Meathead, **Jack GOSSETT**, **Terri FAULKNER**, also known as Shae Loveless, **Jennifer Marie MORRISON**, **Chris SPHABMISAI**, also known as Chino, and **Candace WHITTEN**, along with Matthew Rutledge, Chris Nicholson, Shanda Hawkins, and Gavin Seguin, not named as defendants herein, and others not named have conspired together to possess methamphetamine with the intent to distribute it in the Northern District of Texas and elsewhere.

6. As part of the conspiracy, **Albert CENICEROS, Chad Everett CLIFTON**, also known as Big Wood, **Silton Russell GOUTREAUX**, also known as Pretty Boy, **Brian Thomas GIBBONS**, also known as Meathead, **Jack GOSSETT, Terri FAULKNER**, also known as Shae Loveless, **Jennifer Marie MORRISON, Chris SPHABMISAI**, also known as Chino, and **Candace WHITTEN**, agreed to possess methamphetamine with the intent to distribute it, and knowingly and willfully participated in that agreement.

7. As part of the conspiracy, the common purpose between and among **Albert CENICEROS, Chad Everett CLIFTON**, also known as Big Wood, **Silton Russell GOUTREAUX**, also known as Pretty Boy, **Brian Thomas GIBBONS**, also known as Meathead, **Jack GOSSETT, Terri FAULKNER**, also known as Shae Loveless, **Jennifer Marie MORRISON, Chris SPHABMISAI**, also known as Chino, and **Candace WHITTEN**, along with others was to possess and distribute methamphetamine in the Northern District of Texas and elsewhere.

8. As part of the conspiracy, in general, **Chris SPHABMISAI** distributed methamphetamine to Matthew Rutledge, Chris Nicholson, Shanda Hawkins, and Gavin Seguin, who then re-distributed or brokered methamphetamine transactions between and amongst **Albert CENICEROS, Chad Everett CLIFTON**, also known as Big Wood, **Silton Russell Goutreaux**, also known as Pretty Boy, **Brian Thomas GIBBONS**, also known as Meathead, **Jack GOSSETT**,

Terri FAULKNER, also known as Shae Loveless, **Jennifer Marie MORRISON**, **Chris SPHABMISAI**, also known as Chino, and **Candace WHITTEN**.

9. As part of the conspiracy, its members routinely received and delivered ounce and multi-ounce quantities of methamphetamine that they then distributed to others in the Northern District of Texas and elsewhere.

10. As part of the conspiracy, some of the money derived from the sale and distribution of methamphetamine would be used to purchase additional quantities of methamphetamine.

III. FACTS ESTABLISHING PROBABLE CAUSE THAT A VIOLATION OF 21 U.S.C. § 846 HAS OCCURRED

11. Below is a chronology of some relevant events:

- a. Arrest of R.V. Kerr, on October 18, 2012, and execution of a search warrant at 300 N. Retta St., Fort Worth, Texas.
- b. Arrest of Eddie Clint Reed, on February 11, 2015, by the Johnson County STOP Task Force and the seizure of approximately thirteen (13) ounces of methamphetamine, approximately 5.9 pounds of GHB, two handguns, and approximately twenty seven thousand dollars (\$27,000.00).
- c. Arrest of Matthew Ryan Rutledge, on February 12, 2015, by the Arlington Police Department and the United States Marshal's Service, and the seizure of a Colt M16 fully automatic rifle.
- d. Arrest of Gavin Seguin, on March 17, 2015, by Agents/Officers with Homeland Security, and the Fort Worth Police Department executed a search warrant at the residence of Rachel Adams, located at 1002 Cotton Wood Dr., Benbrook, Texas.
- e. Arrest of Shanda Hawkins, on March 27, 2015, on an outstanding Federal Arrest Warrant.

- f. Arrest of Cooperating Defendant, on May 28, 2015, on an outstanding Federal Arrest Warrant.
- g. Arrest of Jessica Judge, on August 10, 2015, on an outstanding Federal Arrest Warrant.

12. More specifically, the following text messages were obtained:

- a. On February 12, 2015, agents/officers seized a cellular telephone from Matthew Rutledge. Analysis of the text messages revealed that Matthew Rutledge contacted Chad Everett CLIFTON on numerous occasions by text message. The text messages between Matthew Rutledge and Chad Everett CLIFTON used coded language to requests drugs and/or money. For example, on February 6, 2015, Chad Everett CLIFTON texted Matthew Rutledge "Hey dog u think i could pick up a teen or a ball at least im doing bad and need some shit to make a lil money with?" Through training and experience, as well as information I have learned about this specific DTO, a "teen" is coded language for a sixteenth of methamphetamine, or 1.75grams of methamphetamine and a "ball" is coded language for an eight ball of methamphetamine, or 3.5 grams of methamphetamine.
- b. On February 12, 2015, agents/officers seized a cellular telephone from Matthew Rutledge. Analysis of the text messages revealed that Matthew Rutledge contacted Brian Thomas GIBBONS on numerous occasions by text message. The text messages between Matthew Rutledge and Brian Thomas GIBBONS used coded language to requests drugs and/or money. For example, on January 30, 2015, Matthew Rutledge texted Brian Thomas GIBBONS "Only one and a half bro one and a half." Through training and experience, as well as information I have learned about this specific DTO, a "one and a half" is coded language for one (1) and a half (1/2) ounces of methamphetamine, or 42 grams of methamphetamine.

13. During this investigation, **Albert CENICEROS** has been identified as a methamphetamine customer of Chris Nicholson, Tonya Blackwood, and others. Co-conspirator Shanda Hawkins said that on approximately four (4) occasions, she (Hawkins) witnessed Chris Nicholson supply **CENICEROS** with eight (8) ounce quantities of methamphetamine.

Additionally, Hawkins stated that on approximately four (4) occasions, she observed **CENICEROS** in possession of multi kilogram quantities of methamphetamine. Co-conspirator Christina Pugh confirmed that **CENICEROS** was involved in the distribution of methamphetamine. Specifically, Pugh said that on two (2) occasions, she (Pugh) witnessed Chris Nicholson supply **CENICEROS** with four (4) ounces quantities of methamphetamine.

14. Co-conspirator Alisha Feeney identified **Chad Everett CLIFTON** as a methamphetamine distributor whom she (Feeney) had, on approximately four (4) occasions, supplied with two (2) ounce quantities of supplied with multi ounce quantities of methamphetamine and a quarter ($\frac{1}{4}$) ounce of methamphetamine on eight (8) occasions. Additionally, Feeney stated that on two (2) occasions, she (Feeney) observed **CLIFTON** purchase two (2) ounces of methamphetamine from Co-conspirator Chance Brooks, and on seven other (7) occasions she saw **CLIFTON** purchase one (1) ounce of methamphetamine from Chance Brooks.

15. A cooperating defendant (hereinafter CD) identified **Brian Thomas GIBBONS** as a methamphetamine distributor whom he (the CD) attributed approximately 88 ounces of methamphetamine to. Moreover, the CD told investigators that **Brian Thomas GIBBONS** was a methamphetamine-customer of his and a customer of Mandy Turner. Agents/Officers have also interviewed **Brian Thomas GIBBONS** who confessed to distributing methamphetamine to others.

16. Co-conspirator Alisha Feeney identified **Silton Russell Goutreaux** as a methamphetamine distributor whom she (Feeney) had on a daily basis, supplied with one ounce quantities of methamphetamine. Additionally, Feeney also witnessed Gavin Seguin supply **GOUTREAUX** with larger quantities of methamphetamine. Feeney also remembered supplying **GOUTREAUX** with methamphetamine approximately four years prior to her dealings with him in late 2014. Alisha Feeney also identified **Jennifer Marie MORRISON** as a methamphetamine distributor and customer of Chris Nicholson, a co-defendant of Alisha Feeney. **MORRISON's** involvement was corroborated by Christina Pugh, and **MORRISON's** own statements to investigators.

17. During this investigation, **Jack GOSSETT** has been identified as a methamphetamine customer of Tonya Blackwood, Chris Nicholson, and others. Co-conspirator Celeste Blair identified **Jack GOSSETT** as a methamphetamine distributor whom she (Blair) had observed with Tonya Blackwood, in possession of between a half ($\frac{1}{2}$) kilogram and one (1) kilogram of methamphetamine. Blair stated that on multiple occasions, she purchased half ($\frac{1}{2}$) ounce and one (1) ounce quantities of methamphetamine from **GOSSETT** and that on multiple occasions, she (Blair) supplied half ($\frac{1}{2}$) ounce and one (1) ounce quantities of methamphetamine to **Jack GOSSETT**. Co-conspirator Amber Shaw confirmed that **GOSSETT** was involved in distributing methamphetamine. Amber Shaw stated that on multiple occasions, she has observed Chris Nicholson supply **GOSSETT** with user amounts of methamphetamine.


18. Co-conspirator Shanda Hawkins identified Terri **FAULKNER** as a methamphetamine distributor whom she (Hawkins) had on a daily basis, s over a three week period she observed Terri **FAULKNER** pick up one (1) pound quantities of methamphetamine from Co-conspirators Matthew Rutledge and Chris Nicholson. Additionally, Hawkins stated that on at least four (4) occasions she accompanied Co-conspirator Matthew Rutledge when he delivered four (4) ounce quantities of methamphetamine to **FAULKNER**. Hawkins stated that on at least ten (10) occasions, she delivered two (2) ounce quantities of methamphetamine to **FAULKNER**. Hawkins then stated that on at least three (3) occasions, she purchased four (4) ounce quantities of methamphetamine from **FAULKNER**.

19. Co-conspirator Gavin Seguin identified **Chris SPHABMISAI** as a methamphetamine distributor whom he (Seguin) knew distributed approximately two hundred and eighty eight (288) ounces cumulatively of methamphetamine to either him (Seguin) or someone else that he (Seguin) had first-hand knowledge of. As corroboration, Co-conspirator Alisha Feeney told investigators that **SPHABMISAI** was an ounce-quantity supplier of methamphetamine for Co-conspirator Joel Prickett. Feeney knew this because she, Joel Prickett, and Chance Brooks worked together, distributing methamphetamine from multiple hotels, located throughout the Fort Worth area, for a period of time in late 2104. Shanda Hawkins also told investigators about **SPHABMISAI's** drug-dealing activities.

Specifically, Hawkins told investigators that **SPHABMISAI** supplied multi-ounce quantities of methamphetamine to herself, Seguin, and Chris Nicholson. Hawkins and Seguin were romantically involved and worked together distributing methamphetamine from approximately August of 2014 and continuing until approximately April of 2015. Hawkins attributed approximately 441 ounces of methamphetamine coming from **SPHABMISAI** during her involvement with him.

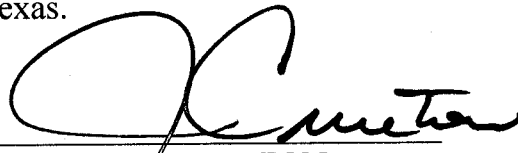
20. Co-conspirator Jessica Judge identified **Candace WHITTEN** as a methamphetamine distributor whom she (Judge) knew to be the drug-partner of Matthew Rutledge before Rutledge went to jail, and that **WHITTEN** participated in multiple methamphetamine-transactions between Jessica Judge and Matthew Rutledge. And Shanda Hawkins confirmed that **WHITTEN** was involved in the distribution of methamphetamine. Specifically, Hawkins said that **WHITTEN** was a methamphetamine customer of her, Gavin Seguin, and Matthew Rutledge. Hawkins estimated that **WHITTEN** received approximately twenty six (26) ounces of methamphetamine cumulatively from the group. Agents/Officers also interviewed a cooperating source (CS) who attributed approximately thirty five (35) ounces of methamphetamine to **WHITTEN**. Specifically, that **WHITTEN** was a customer of the CS and a methamphetamine source of supply for numerous other individuals.

21. Based on the foregoing, the Complainant believes that probable cause exists that **Albert CENICEROS, Chad Everett CLIFTON**, also known as Big Wood, **Silton Russell Goutreaux**, also known as Pretty Boy, **Brian Thomas GIBBONS**, also known as Meathead, **Jack GOSSETT, Terri FAULKNER**, also known as Shae Loveless, **Jennifer Marie MORRISON, Chris SPHABMISAI**, also known as Chino, and **Candace WHITTEN**, along with others both known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(B), namely to distribute and to possess with intent to distribute more than 50 grams of methamphetamine, in violation of 21 U.S.C. § 846.



Brian Finney
Special Agent
Drug Enforcement Administration

SWORN AND SUBSCRIBED before me, at 10:34 ~~10~~ pm, this 28th day of March, 2016, in Fort Worth, Texas.



JEFFREY L. CURETON
United States Magistrate Judge